

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

**IN RE: APPLICATION OF ELECTRIC POWER BOARD OF CHATTANOOGA
FOR A CERTIFICATE OF CONVENIENCE AND NECESSITY TO
PROVIDE INTRASTATE TELECOMMUNICATIONS SERVICES**

'98 JAN 28 PM 2 14

DOCKET NO. 97-07488

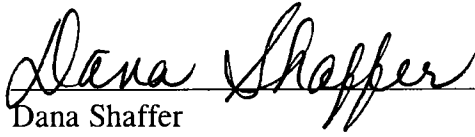
**DISCOVERY REQUEST OF NEXTLINK TENNESSEE
TO THE ELECTRIC POWER BOARD OF CHATTANOOGA**

NEXTLINK Tennessee ("NEXTLINK") requests that the Electric Power Board of Chattanooga (the "Board") answer under oath in accordance with Rules 26 and 33 of the Tennessee Rules of Civil Procedure the following interrogatories. These interrogatories are continuing in nature and Rule 26 of the Tennessee Rules of Civil Procedure requires you to seasonably supplement your responses to these interrogatories.

I. DISCOVERY REQUESTS

1. Please submit a copy of any business plans and feasibility studies developed by the Board for its telecommunications division
2. Please provide a copy of any agreement between the Board and the Competitive Communications Group
3. Please provide detailed information on capital financing plans the Board will have in place to fund its new telecommunications division
4. Please submit any agreement between Chattanooga Electric Power Board's electric division and its telecommunications division regarding the use of pole attachments and conduits.

Respectfully submitted,

A handwritten signature in cursive script, reading "Dana Shaffer", is written over a horizontal line.

Dana Shaffer

NEXTLINK Tennessee

105 Molloy Street

Nashville, TN 37201

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been forwarded via U.S. Mail, postage prepaid, on this 28th day of January, 1998 to.

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Tennessee Regulatory Authority
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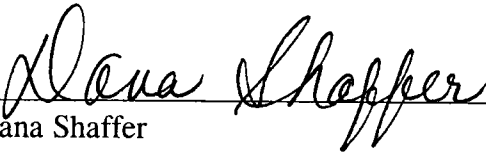
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Dana Shaffer